REMARKS

Applicant initially amends the paragraphs 0003 and 0004 of the specification to correct a typographical error and provide a missing serial number. No new matter has been added.

Applicant next revisits the Restriction made by the Patent Office on 29 August 2002. In light of the art cited against the claims elected, Applicant requests a withdrawal of the restriction or an acknowledgment that the art is non-analogous. While Applicant did not traverse the Restriction at the time, the use of Finley et al. in the rejection of the claims points out the waste of resources that this Restriction represents. The Patent Office, in the original Restriction, indicated that kiosks and fuel dispensers were sufficiently different as to merit the restriction. Now, the primary reference that the Patent Office cites, and the Patent Office's comments with respect to claim 4, indicates that fuel dispensers and kiosks are deemed to be the same thing. The Patent Office cannot have it both ways. Either kiosks and fuel dispensers are sufficiently different to merit the Restriction, or claim 4 cannot be rejected over a fuel dispenser reference. Applicant can abide by either decision, but the reference is either non-analogous or the restriction is unwarranted.

Summary of the Present Invention

Before addressing the merits of the rejection, a review of the present invention is in order. The present invention is directed to a device that has multiple browser applications and multiple displays incorporated therein. The specific example is a two sided kiosk that has two displays. The two displays report to a display controller within the device. In an exemplary embodiment, this display controller is a single printed circuit board within the device with a microprocessor or microcontroller thereon. The display controller includes communication electronics which communicate to a remote location - namely, a server running a control application. Further, the display controller has a control system that accepts inputs from users using the displays, runs the browser applications on each display, and receives instructions about what the browser applications display from the control application.

Applicant has herein amended the claims to highlight three novel features. Claims 1 and 14 have been amended to recite that the display controller is assigned a unique IP address and that the displays are assigned unique ports associated with the IP address. This corresponds to the original subject matter of claim 10. Claim 13 has been rewritten in independent form and

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highlights the wireless aspect of the present invention. Claim 20 has been amended to include the coupon printing discussed at various locations in the specification, but at least at paragraph 8.

Rejections under 35 U.S.C. § 102

The Patent Office has rejected the claims under 35 U.S.C. § 102 as being anticipated by Finley et al. or alternatively Siefert. For the Patent Office to issue a proper anticipation rejection, the Patent Office must show where in the reference each and every claim element is located. MPEP § 2131. Further, the elements of the reference must be arranged in the manner claimed. This is a fairly rigorous standard. Turning now to the rejections themselves, Applicant will address Siefert first.

Siefert

Applicant has studied the Office Action and finds portions of it incomplete. The Patent Office rejected claims 1 and 4-27 in view of Siefert. The Patent Office lumped its analysis of claims 1, 14, 20, and 22 into a single analysis and provided no further analysis for any other claim. For example, there is no analysis of where the kiosk is located in the reference (claim 4); there is no analysis of where there is a web server application (claim 6); or the like. Under the strict requirements of an anticipation rejection, many of the dependent claim elements are not shown in the reference and the claims are not properly rejected. If the Patent Office believes that the dependent claims are properly rejected under 35 U.S.C. § 102, then Applicant requests that the Patent Office provide analysis of where each and every claim element can be found in the reference. Further, Applicant herein amends claims 1, 14, and 20 to include claim elements that are not shown by the reference.

Finley et al.

Claims 1 and 4-27 were rejected in view of Finley et al. as well. In this rejection, the Patent Office did try to lay out where each element was located in the references. However, the Patent Office's analysis is flawed with respect to original claims 10 and 13.

Claim 10 recites that the display controller has a unique IP address and the browser applications are assigned unique ports associated with the IP address. The Patent Office points to column 6, lines 50-62 for support for its position with respect to this element. Applicant has carefully reviewed the cited section and respectfully traverses the Patent Office's conclusion. While the passage does indicate that the SM 300, DC 310 and remote connection 400 use TCP/IP, there is no teaching that the display controller has its own IP address and that the

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browser applications are assigned ports associated with that IP address. Under the rigorous standard of an anticipation rejection, the claim elements must be taught. Since there is no teaching that the browser applications are assigned to unique ports, and there is no explicit teaching that the display controller has a unique IP address, the Patent Office has not shown these elements and the claim is not anticipated. Applicant has herein amended claims 1 and 14 to include this element so that claims 1, 14, and their dependents are not anticipated by the rejection of record.

Claim 13 recites a wireless communication for the communication electronics. The Patent Office points exactly the element which refutes the element being in the claim - namely, the POTS lines. POTS are *de facto* wirebased communication elements. While they may be accessed through a gateway by a cell phone as the Patent Office alleges, they are inherently incapable of wireless communication in and of themselves. No one of ordinary skill in the art would construe the POTS lines of the reference to be the same as wireless communication electronics. Thus, this portion of the citation does not support an anticipation rejection. The second citation to the satellite receiver is in the site manager 1401, which is not the display controller of the claim. Since the display controller of the claim does not have the satellite receiver, the claim elements are not arranged in the reference in the same manner that they are arranged in the claim and this portion of the anticipation analysis fails.

Claim 20 has been amended to include the coupon printing. Nothing in the references teaches or suggests the coupon printing, thereby mooting the rejection of claim 20 and its dependents.

Applicant has cancelled independent claim 22 and added one new independent claim, so no new fee should be required.

Double Patenting

Applicant acknowledges the double patenting rejection in light of U.S. Patents 6,052,629 and 6,176,421 and will provide a terminal disclaimer in the event that allowable subject matter is otherwise indicated.

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For the foregoing reasons, Applicant requests reconsideration of the rejection and claim allowance at the Examiner's earliest convenience.
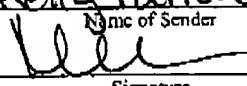
Respectfully submitted,

WITHROW & TERRANOVA, P.L.L.C.

By: _____

Steven N. Terranova
Registration No. 43,185
P.O. Box 1287
Cary, NC 27512
Telephone: (919) 654-4520

Date: _Feb. 19, 2003_
Attorney Docket: 2400-667

VERSION WITH MARKINGS TO SHOW CHANGES MADE

In the Specification:

Please replace paragraph 0003, with the following rewritten paragraph:

--   In addition to local transactions, various types of information services are being provided at the fuel dispenser. In particular, Internet-related services are now being provided at the fuel dispenser. These services range from allowing customers to view various web pages to obtain desired information to supplying predefined advertising information to the customer via local or remote content servers. Additional information may be found in the following commonly assigned applications entitled INTERNET CAPABLE BROWSER DISPENSER ARCHITECTURE: U.S. Patent No. 6,052,629, issued April 18, 2000; U.S. Patent No. 6,026,866, issued February 22, 2000; Serial No. 09/500,094, filed February 8, 2000; Serial No. 09/499,979, filed February 8, 2000; and Serial No. [___/_____] 09/828,050, filed April 5, 2001, which are incorporated herein by reference in their entirety.--.

Please replace paragraph 0004, with the following rewritten paragraph:

--   Unfortunately, the vast majority of fuel dispensers already in existence [includes] include displays and associated input devices that are insufficient for supporting web-based interaction. Further, many of the fuel dispensers fail to include the necessary control electronics to readily support such interaction.--.

In the Claims:

Please amend claims 1, 13, 14, and 20 as follows:

1. (Once amended) A system for providing a multiple browser interface comprising:
   a) a plurality of displays with associated input devices; and

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b) a display controller associated with said plurality of devices, said display controller comprising:

i) communication electronics for communicating with a server running a control application; and

ii) a control system associated with said communication electronics and adapted to:

1) run browser applications for each of said plurality of displays;

2) receive input from each of said input devices and provide the input to the control application; and

3) receive instructions for said browser applications from the control application; and

wherein said display controller further assigned one Internet Protocol (IP) address and each of the browser applications is assigned a unique port associated with the IP address.

13. (Once amended) [The system of claim 1] A system for providing a multiple browser interface comprising:

        a) a plurality of displays with associated input devices; and

        b) a display controller associated with said plurality of devices, said display controller comprising:

                i) communication electronics for communicating with a server running a control application; and

                ii) a control system associated with said communication electronics and adapted to:

                        1) run browser applications for each of said plurality of displays;

                        2) receive input from each of said input devices and provide the input to the control application; and

                        3) receive instructions for said browser applications from the control application; and

        wherein said communication electronics are wireless communication electronics adapted to provide wireless communications with the server.

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14. (Once amended) A method of supporting multiple browsers comprising:

[a)] running browser applications for each of a plurality of displays associated with input devices at a first location;

assigning one Internet Protocol address to a display controller associated with the plurality of displays;

assigning a unique port associated with the IP address to each of the browser applications;

[b)] receiving input from each of the input devices;

[c)] sending the input to a control application at a second location; and

[d)] receiving instructions for said browser applications from the control application.

20. (Once amended) A system for supporting a multiple browser controller comprising:

a) communication electronics for communicating with the multiple browser controller; and

b) a control system associated with said communication electronics and adapted to:

i) receive user input sent from the multiple browser controller; and

ii) send instructions for browser applications running on the multiple browser controller based on the input;

iii) receive a request from one of the browser applications corresponding to the instructions; [and]

iv) send content to the multiple browser controller for display by the one of the browser applications; and

v) send a command to a printer peripheral associated with the browser application to print coupons.

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